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Attorneys for Oracle America, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

ORACLE AMERICA, INC., a Delaware
Corporation,

Plaintiff,
v.

**THE OREGON HEALTH INSURANCE
EXCHANGE CORPORATION, dba
COVER OREGON, an Oregon public
corporation; THE STATE OF OREGON,
BY AND THROUGH THE OREGON
HEALTH AUTHORITY AND THE
OREGON DEPARTMENT OF HUMAN
SERVICES, AND DOES 1-25, INCLUSIVE**

Defendants.

Case No. 3:14-cv-01279-BR

**UNOPPOSED MOTION TO DISMISS
WITHOUT PREJUDICE ORACLE'S
PENDING STATE LAW CLAIMS**

LOCAL RULE 7.1 CERTIFICATION

Counsel for Oracle certifies that she conferred telephonically with counsel for defendants, and defendants do not oppose this motion.

MOTION

Oracle America, Inc. hereby moves the Court for an order dismissing without prejudice Oracle's claims against Cover Oregon for Breach of Contract, Breach of the Implied Covenant of Good Faith and Fair Dealing, and *Quantum Meruit*, as these claims are now pending as counterclaims in *Rosenblum, et al. v. Oracle, et al.*, Case No. 14C20043 (Circuit Court of Oregon, Marion County).

This Motion renders moot Cover Oregon's Pending Motion to Dismiss Oracle's State Law Claims, ECF No. 118.

Respectfully submitted,

Dated: May 11, 2015

By: /s/ Brenna K. Legaard

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